

RICHARD A. HARRIS, ESQ.

Nevada State Bar No. 505

RICHARD HARRIS LAW FIRM

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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KELLIE T. FORD,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL
SECURITY

Defendants.

Case No. 2:16-cv-02614-APG-NJK

**STIPULATION FOR EXTENSION
OF TIME TO FILE MOTION TO
REMAND (*SECOND REQUEST*)**

Comes now Plaintiff, by and through his attorney, RICHARD HARRIS, ESQ., and requests an eight (8) day extension of time, through and including April 7, 2017 to file the **MOTION TO REMAND**. Plaintiff's current deadline to file the **Motion to Remand** is March 30, 2016. Defendant's counsel has been contacted, has no objection to this request, and stipulates to this Motion via email.

This extension is necessary because the firm's contract appellate associate, Linda Ziskin, who will be writing the briefs, has been ill this week.

It is therefore respectfully requested that Plaintiff be granted an 8-day extension of time to file the **MOTION TO REMAND** up to and including April 7, 2016.

1 DATED this 22nd day of March 2017.

2 /s/ Richard A. Harris

3 **RICHARD A. HARRIS, ESQ.**

4 Nevada State Bar No. 505

5 RICHARD HARRIS LAW FIRM

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8 Ph: (702) 444-4392

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11 Attorney for Plaintiff

DATED this 22nd day of March 2017.

/s/ Jeffrey Chen

(As authorized via email 3/22/17)

MICHAEL MARRIOTT, ESQ.

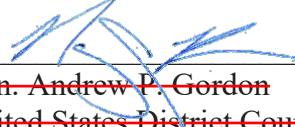
Special Assistant U.S. Attorney

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(415)977-8939

12 IT IS SO ORDERED.

13 
14 ~~Hon. Andrew P. Gordon~~
15 ~~United States District Court Judge; or~~
16 Hon. Nancy J. Koppe
17 United States Magistrate Judge

18 DATED: March 23, 2017